RETA Chapter Meeting Schedule

ARIZONA
- PHOENIX
  4th Thursday; 6 pm
- SOUTHWEST
  2nd Wednesday; 6 pm

ARKANSAS
- NORTHWEST ARKANSAS
  2nd Thursday; 6 pm

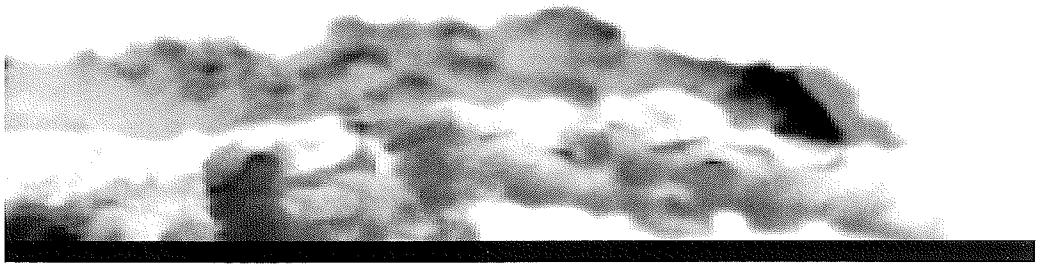
CALIFORNIA
- BAY AREA
  3rd Wednesday; bi-monthly; 6:30 pm
- CALIFORNIA CHAPTER #2
  3rd Wednesday; 6 pm
  No meeting in December
- CENTRAL VALLEY
  3rd Thursday; 6:30 pm
- INLAND EMPIRE
  3rd Tuesday; 6 pm
- KERN
  Last Wednesday; 7 pm
- MONTEREY BAY
  3rd Wednesday; 6 pm
- SAN JOAQUIN
  2nd Tuesday; 6 pm
- SANTA MARIA
  Last Thursday; 6 pm
  No meeting December

DELAWARE
- DELMARVA
  3rd Tuesday; 6:30 pm

FLORIDA
- CENTRAL FLORIDA
  3rd Thursday; 6:30 pm
- NORTH FLORIDA
  2nd Thursday; 6:30 pm
  No meeting in July or October
- SOUTH FLORIDA
  2nd Thursday

GEORGIA
- ATLANTA
  2nd Thursday; 6:30 pm
  No meeting in June or July

IDAHO
- TREASURE VALLEY
  3rd Tuesday



How to Effectively Manage Change!

By Marjorie Buyson and Jennifer Green, SCS Tracer Environmental

Part 2: Managing Revisions and Recommendations

There are many key items involved in the implementation of Management of Change (MOC) procedures, as required by the OSHA Process Safety Management (PSM, 29 CFR 1910.119) and EPA Risk Management Program (RMP, 40 CFR Part 68) regulations. In the first part of this article (see the 2012 Issue #6 of the RETA *Breeze*), we examined how to recognize a *change* and the importance of initiating and completing MOC documentation in a timely manner. In this second part, we will focus on the merits of completing an MOC for PSM and RMP documentation changes and for tracking recommendations resulting from compliance audits, PHA studies, and mechanical integrity inspections.

MOCs for Document Revisions

You just completed the annual review and certification of your refrigeration system SOPs, and let's say that the review resulted in some changes to the procedures. Some of you may just directly proceed with updating the procedures, identify the changes as revision number X, and then call it a day. So what's wrong with this picture? Well, the PSM and RMP regulations state that an MOC must be completed to address changes in procedures. The reason for this is that it compels you to really think about the effects of the changes and ensures that all bases are covered in terms of the PSM and RMP requirements. By going through the MOC paperwork, you are reminded that perhaps other prevention programs need to be reviewed and updated as well such as the Process Safety Information (remember that the PSI and SOPs should be consistent with each other). By performing a health and safety review, you may find that some of the procedural changes may require the use of additional PPE or implementation of the buddy system. The review also makes you consider if the changes follow RAGAGEP (recognized and generally accepted good engineering practices). In addition, the MOC process ensures that training on the updated procedures is provided to those whose work tasks are affected by the changes (i.e., your operators/maintenance mechanics and, if applicable, your contractor).

As another example, let's say that you are performing a review/update of your Emergency Response Plan as a result of recent layoffs in the maintenance department. If you put this ERP revision through the MOC process, you may find that other PSM and RMP related items need to be addressed. For example, a correction to your EPA RMP submittal may have to be submitted if the emergency contact has changed (remember this is due within 30 days of the change). Perhaps because of the layoffs, you have hired an outside contractor to assist with maintenance activities. This would trigger the implementation of your Contractor

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Safety program and an update to your written Mechanical Integrity program to address the use of contractors. You may also find that your maintenance schedule needs to be adjusted to account for reduced maintenance personnel, and if this is the case, you need to assess how the changes to the schedule will affect the integrity and safety of your system. As mentioned previously, you need to provide training to employees who took over the job duties of those who were laid off. Training on revised policies and procedures also needs to be performed. These are just few of the many items that you might not think about if it were not for your MOC program.

MOCs for Tracking Recommendations

The PSM and RMP regulations require that recommendations resulting from compliance audits, PHA studies, mechanical integrity inspections, etc. be implemented or addressed in a timely manner and that the resolutions be documented. Did you know that the MOC process provides the perfect tool for ensuring that this occurs? Here's how:

Compliance audit recommendations are generated to improve the implementation of the PSM and RMP programs, for example updating training documentation or written programs to reflect current facility practices. If these recommendations are not periodically reviewed they may only be updated during the next audit, which will not occur for three years. The MOC process provides the perfect opportunity to document the resolution and ensure the recommendations are addressed in a timely manner. The MOC process also ensures that any affects to other portions of the PSM document are reviewed and if necessary updated as mentioned in the previous section.

Similarly, during a PHA, recommendations are generated to improve the safety of the system, for example, ensuring that the compressor safeties are tested annually. Implementing the MOC process allows for the ability to document if the change (recommendation) is critical or routine. It also includes a timeline which can be used to map out the schedule for completing the recommendation. In this case the change may be deemed critical, if they have not been regularly tested, as it is a key protection for the system and thus may have a shorter timeline for completion.

During a mechanical integrity inspection, recommendations are made regarding the condition of the system and the effectiveness of the Mechanical Integrity program. These recommendations may range from replacing relief valves to further inspection of insulation leading to non-destructive testing. In this case the MOC process lends itself well to tracking the completion of the recommendations. Some of these recommendations may be deemed replacements in kind however this can also be documented through the MOC process. If the change is a replacement in kind then the full MOC process does not need to be completed however the completion of the recommendation will still be documented. For recommendations that may take longer due to additional expenditures (i.e. non-destructive testing), the MOC process provides documentation on the plan for completion and the backup for the timeline.

As shown by these examples, there are multiple benefits in completing a MOC for PSM and RMP documentation revisions and for tracking recommendations resulting from audits, PHA studies, and mechanical integrity inspections. The MOC process is an effective way of ensuring that you have considered the effects of the proposed changes and that you have adequately addressed all the necessary PSM and RMP elements affected by the change.

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Questions from Federal or State Regulators

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What do you think?

My opinion is a qualified, yes. Slight corrosion is exactly that. Define slight corrosion? As long as it meets ASME B31G Manual for Determining the Remaining Strength of Corroded Pipelines and ASTM the yearly inspection is adequate by guidelines. To me this is in the eye of the inspector. What is trend? Has pipe or equipment been in service for one year, five years, and 10 years? Hard question to answer. It depends on application. No clear guideline.

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MOC – Make it Easy as 1-2-3

You may be thinking that this is an awful lot of forms and paperwork that you will need to 1) create and 2) store at your facility. A simple solution is to open one MOC per task (i.e. audit recommendations, documentation edits, etc.). This way the MOC can remain open over the course of completing the task. For example, open one MOC at the beginning of the year to track all edits to the PSM and RMP program elements. This should help to reduce the total quantity of MOC's while still ensuring the process is followed. As we mentioned in Part 1 of this article, if in doubt, be on the safe side and implement your MOC procedure – down the road when you are audited by a regulator, you may just be glad you did!

REFERENCES

1. 29 CFR, § 1910.119 Process Safety Management of Highly Hazardous Chemicals, Explosives, and Blasting Agents, paragraphs (l) and (i).

2. Code of Federal Regulations, Title 40 Part 68, Clean Air Act 112(r), Risk Management Program Rule.